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May 7, 2025

VIA ECF

Hon. Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Iris Abaev v. Centene Management Company, LLC
Case No. 1:25-cv-01511-RER-VMS

Dear Judge Scanlon:

This firm was retained to represent Defendant Centene Management Company, LLC in this matter. We filed notices of appearance earlier today. Pursuant to Your Honor's Individual Practice Rules II(b), we write to request the June 5, 2025 Default Conference be adjourned *sine die*, and that the Defendant be granted a 30-day extension to file its response to the Complaint.

The executed summons filed with the Court states that Defendant's response to the Complaint was due April 14, 2025 (ECF No. 6). Upon receiving notice of the Plaintiff's default motion earlier today, we immediately reached out to inform Plaintiff's counsel of our retention in this matter and request Plaintiff's consent to an extension to respond to the Complaint. Per our discussion, Plaintiff has agreed to withdraw her default motion (ECF No. 8) as well as to allow Defendant 30 days to respond to the Complaint. Thus, we respectfully request that the default motion be noted as withdrawn, the June 5 Default Conference be adjourned *sine die*, and that the Defendant have until June 7, 2025 to file its response to the Complaint. Thank you for Your Honor's consideration and attention to this matter.

Respectfully submitted,

/s/ Rebecca Goldstein
Rebecca Goldstein

Cc: All Parties (via ECF)